

REMARKS

Claims 17-33 are pending in the application. The Office has objected to claims 17, 25 and 32 because of informalities. The Office has rejected claims 17-33 under 35 U.S.C. § 112, first paragraph as failing to comply with the enablement requirement. The Office has also rejected claims 17-33 under 35 U.S.C. § 102(e) as being anticipated by Worden (U.S. Pat. Pub. No. 2003/0149934; hereinafter “Worden”). This is a non-final Office action and is responsive to Applicant's pre-appeal brief filed on or about May 4, 2007.

Claim Amendments

Applicant requests that the amendments to the claims be entered into this application. The amendments remove the claim language referenced in the Office's claim objections and 112 first paragraph rejection. No new subject matter or limitations have been entered.

102(e) Rejection by Worden

Worden does not show or suggests “translating data from a format of a data model of a first software component to a format of a data model of a second software component,” as required by Applicant. The Office asserts that Worden does teach these limitations and cites paragraph 31 of Worden for support. (Office action, page 4, item 6.) Applicant disagrees. Worden teaches “a computer program which uses a set of mappings between XML logical structures and business information model logical structures, in which the mappings describe how a document in a given XML based language conveys information in a business information model.” (Paragraph 27, page 2.) Applicant requires a “data model of a ... software component.” Worden identifies a computer program but instead of teaching a data model of the computer program, Worden teaches that the computer program *uses* a set of mappings. In the cited paragraph, Worden states that the “mappings ... are read by software as data, not ‘hard-coded’ in software.” Worden clearly teaches that the mappings are just data to be operated on and processed by the software. Worden's mappings are not a data model *of* the software component as

required by Applicant. Worden teaches that the mappings describe a document, which is not the same as or even equivalent to a data model of a software component, as required by Applicant. The mappings are simply data read by Worden's computer program. The mappings are not a data model of the computer program. Worden specifically states that the mappings are not hard-coded in the software. (Paragraph 31.) Therefore, Worden's program can have no knowledge of the mappings until the mappings are read as data by the program. Worden teaches that the mappings describe a document, which is clearly not part of the program. If the program has no hard-coded or inherent knowledge of the mappings and the mappings describe a document and not the program, the mappings cannot be a data model of a software component, as required by Applicant. Therefore, these elements are missing from Worden.

Applicant requires a first and second software components and data models of each software component. Applicant cannot find where the Office asserts a second software component. The business information model is clearly not a software component because Worden states "the business information model preferably categorizes the information relevant to the operations of a business..." (Paragraph 37.) The business information model is simply a collection of data that describes the operation of a business. There is no teaches that business information model is software. Additionally, Worden does not teach that the business information model is part of a software component. Therefore, the business information model is not the same as nor does it equate to Applicant's data model of a software component. It follows then that any schema for the business information model would not satisfy any elements of Applicant's claimed invention related to a data model of a software component. However, the Office asserts that Worden's "XML represented by a business model reads on schema comprising a model." (Office action, page 4, section 6.) Applicant disagrees. As shown above, the business information model does not equate to any of the elements required by Applicant. Therefore, the assertion is improper and the Office has failed to show that this element is anticipated by Worden.

The Office has failed to show that Worden anticipated at least the above detailed elements of Applicant's claimed invention. Therefore, the rejection is improper and all claims are allowable over the prior art of record.

103(a) Rejection of the Dependent Claims

Claims depending from claims 17, 25, and 32 are allowable for at least the same reasons presented above.

CONCLUSION

Applicant asks that the Office reconsider this application and allow all pending claims. Please charge any fees that might be due, excluding the issue fee, to deposit account 14-0225.

Respectfully submitted,

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(Electronically Filed)

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